

22 MAG 5993

Approved:

Micah Fergenson

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Assistant United States Attorneys

Before: HONORABLE ONA T. WANG
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : **COMPLAINT**
:
- v. - : Violation of
: 21 U.S.C. § 846; 18
: U.S.C. § 924(c)
JONATHAN GRULLON, :
a/k/a "JD Dula," : COUNTY OF OFFENSE:
: NEW YORK
Defendant. :
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

FRANCIS CONEJO, being duly sworn, deposes and says that he is a Detective with the New York City Police Department (the "NYPD"), and charges as follows:

COUNT ONE
(Narcotics Conspiracy)

1. Between in or about April 2021 and in or about July 20, 2022, in the Southern District of New York and elsewhere, JONATHAN GRULLON, a/k/a "JD Dula," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JONATHAN GRULLON, a/k/a "JD Dula," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that JONATHAN GRULLON, a/k/a "JD Dula," the defendant, conspired to distribute and to possess with intent to distribute, were (i) 10 grams and more of mixtures and substances containing a detectable amount of a

fentanyl analogue, in violation of Title 21, United States Code, Section 841(b)(1)(B); (ii) a quantity of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C); (iii) a quantity of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (iv) a quantity of mixtures and substances containing a detectable amount of Oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Firearms Use, Carrying, and Possession)

4. Between in or about April 2021 and in or about July 2022, in the Southern District of New York and elsewhere, JONATHAN GRULLON, a/k/a "JD Dula," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did knowingly possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

5. I am a Detective with the NYPD, and I have been personally involved in this investigation. This affidavit is based on my investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. Based on my training and experience, my participation in this investigation, including my personal observations, my conversations with an undercover law enforcement officer (the "UC") and other law enforcement agents, including consensual video and audio recordings of at least some of the communications described below, my review of law enforcement

reports and records, and my review of other materials specified below, I have learned, among other things, the following:

a. Between in or about April 2021 and in or about July 2022, JONATHAN GRULLON, a/k/a "JD Dula," the defendant, and a co-conspirator not named herein ("CC-1") sold narcotic substances to the UC on approximately three occasions. Specifically:

i. On or about May 5, 2021, the UC met with CC-1 in the vicinity of West 162nd Street between Broadway Avenue and St. Nicholas Avenue in New York, New York (the "Location") for the purpose of engaging in a narcotics transaction. CC-1 informed the UC, in sum and substance, that he could obtain narcotics from GRULLON, who was seated inside of a vehicle ("Vehicle-1"). The UC informed GRULLON that he wanted to purchase "five" twenty-dollars' worth of "dope," which based on my training and experience, I know to be a reference to heroin. GRULLON opened the dash compartment of Vehicle-1 where he removed a clear twist containing numerous plastic ziplock bags and handed the UC five bags containing a tan substance, which subsequently tested positive for fentanyl. In exchange, the UC handed CC-1 one-hundred dollars in pre-recorded money.

ii. On or about May 8, 2021, the UC met with GRULLON at the Location for the purpose of engaging in a narcotics transaction. GRULLON was seated in Vehicle-1. GRULLON informed the UC, in sum and substance, that he had "seven," which based on my training and experience and involvement in this investigation, I know to be seven ziplock bags of heroin. GRULLON then removed seven ziplock bags from his pants containing a tan substance, which subsequently tested positive for fentanyl. In exchange, the UC handed GRULLON one-hundred-forty dollars in pre-recorded money.

iii. On or about July 13, 2021, the UC met with GRULLON at the Location for the purpose of engaging in a narcotics transaction. The UC informed GRULLON that he wanted to purchase "ten" of "dope." GRULLON agreed and proceeded to walk towards CC-1, where they had a brief conversation. GRULLON then entered another vehicle ("Vehicle-2") and returned to the UC. GRULLON informed the UC that he only had "five" and handed the UC five ziplock bags containing a tan substance, which subsequently tested positive for fentanyl. In exchange, the UC handed GRULLON fifty dollars in pre-recorded money.

b. CC-1 has sold narcotics to the UC at the Location on approximately twenty other occasions between April 2021 and December 2021, during which GRULLON was not present.

7. Based on my participation in this investigation, and my discussion with other NYPD officers, I have learned that a judicially-authorized search warrant was executed on or about July 20, 2022, at an apartment located on 162nd Street in Manhattan ("Apartment-1"), which is in the immediate proximity to the Location. JONATHAN GRULLON, a/k/a "JD Dula," was arrested in Apartment-1. Further, I have learned, among other things, the following:

a. Apartment-1 appears to be a three-bedroom apartment where GRULLON and relatives (namely, "Relative-1" and "Relative-2") reside.

b. Shortly after approximately 6:00 a.m. on or about July 20, 2022, GRULLON, Relative-1, Relative-1's girlfriend, and Relative-2 were found inside Apartment-1. GRULLON was thereafter placed under arrest.

c. Other NYPD officers and I recovered from Apartment-1 the following, among other things:

i. Several grams of a white powdery substance were recovered which, based on my training and experience, appears to be cocaine. Approximately thirteen baggies of suspected cocaine were recovered from a bedroom ("Bedroom-1").

ii. In addition, a bag containing multiple grams of suspected cocaine were recovered from a coat that was hanging in a closet ("Closet-1"), which was located to the left of Bedroom-1. A separate shirt (the "Shirt") located in Closet-1 contained a dry cleaning tag which listed the owner's name as "Jonathan."

iii. The NYPD also recovered from Apartment-1 95 pills that, based on my training and experience, appear to be Percocet pills, as well as approximately 120 pills that, based on my training and experience, appear to be Ecstasy pills.


iv. The NYPD also recovered from Bedroom-1 drug paraphernalia, including baggies and a scale.

v. The NYPD also recovered a .38 Special Smith and Western handgun (the "Firearm") from a closet located in Bedroom-1 ("Closet-2"), along with approximately 25 rounds of ammunition for the Firearm. In addition, 19 rounds of ammunition for the Firearm were recovered next to Closet-2 in Bedroom-1. The serial number on the Firearm appears to have been defaced. During the search, GRULLON further told an officer, in sum and substance, that there was a gun in Closet-2, which is where the Firearm was found.

vi. Mail addressed to GRULLON at the Apartment-1 address, as well as a state driver's license in the name of "Jonathan Grullon," were also recovered from Bedroom-1.


8. Based on my review of lab reports prepared during this investigation, I know that, in total, JONATHAN GRULLON, a/k/a "JD Dula," the defendant, and CC-1 provided the UC with over 10 grams of parafluorofentanyl, a fentanyl analogue.

WHEREFORE, I respectfully request that JONATHAN GRULLON, a/k/a "JD Dula," the defendant, be imprisoned or bailed, as the case may be.


FRANCIS CONEJO
Detective
NYPD

in person
~~Sworn to me through the transmission of this Complaint by~~
~~reliable electronic means,~~ pursuant to Federal Rules of Criminal
Procedure 41(d)(3) and 4.1, this

21st
day of July, 2022


THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK